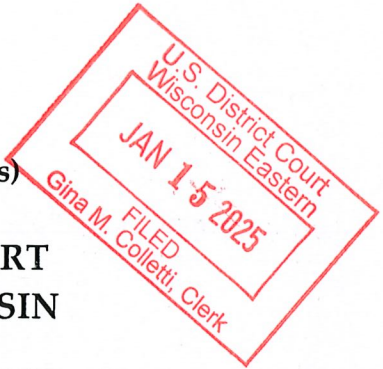


# COMPLAINT

(for non-prisoner filers without lawyers)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN



(Full name of plaintiff(s))

Jackie D. Mason

v.

Case Number:

(Full name of defendant(s))

25-cv-75

(to be supplied by Clerk of Court)

Joseph Boehlke, Jennifer  
Johnson, Cindy Carlson,  
Jon Charles, Philip Simmert, II.

### A. PARTIES

1. Plaintiff is a citizen of United States and resides at  
(State)

5915 N. 74<sup>th</sup> Milwaukee WI 53218  
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Joseph M. Boehlke  
(Name)

A. Parties

2. Is a citizen of United States and resides at 3626 W. Fond Du Lac, Ave., Milwaukee, WI., and worked for the Milwaukee Police Department.

**JENNIFER JOHNSON:** Is a citizen of the United States and resides at 3626 W. Fond Du Lac, Ave., Milwaukee, WI., and worked for the Milwaukee Police Department.

**CINDY CARLSON** (aka CINDY K. BEASTER): Is a citizen of the United States and resides at 2333 N. 49<sup>th</sup> St., Milwaukee, WI., and worked for the Milwaukee Police Department.

**JON CHARLES:** Is a citizen of the United States and resides at 2333 N. 49<sup>th</sup> St., Milwaukee, WI., and worked for the Milwaukee Police Department.

**PHILIP SIMMERT, II:** Is a citizen of the United States and resides at 2333 N. 49<sup>th</sup> St., Milwaukee, WI., and worked for the Milwaukee Police Department.

**B. STATEMENT OF CLAIM**

**JOSEPH BOEHLKE** on January 10, 2012, arrested and/or detained the Plaintiff, Jackie Mason, and in support of this arrest filed Milwaukee Police Incident Report # 120100158, alleging the Plaintiff committed one count of felony battery.

This charge was count 5 of *State of Wisconsin v. Jackie Mason*, Case No.

12CF000228, and was in part responsible for the Plaintiff being, unlawfully, detained in maximum security prisons for over 10 years.

The Plaintiff asserts Boehlke did not have probable cause to arrest the Plaintiff for Battery, and further, included in Report #120100158, statements that were knowingly false, with reckless disregard for the truth, and omitted statements that supported a lack of probable cause to arrest the Plaintiff.

The Plaintiff asserts the actions of Joseph Boehlke violated his rights under the 4<sup>th</sup> Amendment of the United States Constitution.

**JENNIFER JOHNSON:** ON January 10, 2012, arrested and/or detained the Plaintiff, Jackie Mason, in the city of Milwaukee. In support of this arrest Johnson filed Milwaukee Police Incident Report # 120100158, alleging the Plaintiff committed 1

count of felony battery. This charge was count 5 in *State of Wisconsin v. Jackie Mason*, Case No. 12CF000228, and was in part responsible for the Plaintiff being unlawfully detained in maximum security prisons for over 10 years.

The Plaintiff asserts Johnson did not have probable cause to arrest the Plaintiff for felony battery, and further, included in Report # 120100158 statements that were knowingly false, with reckless disregard for the truth, and omitted statements that supported a lack of probable cause to detain the Plaintiff.

The Plaintiff asserts Johnson violated his rights under the 4<sup>th</sup> Amendment of the United States Constitution.

**CINDY CARLSON:** On January 10-11, 2012, arrested and/or detained the Plaintiff, Jackie Mason, in the city of Milwaukee. In support of the Plaintiff's detention Carlson filed Milwaukee Police Incident Report 120100162, alleging the Plaintiff committed one count of felony battery, and one count of 3<sup>rd</sup> degree sexual assault. This report became the bases for counts 3 and 4 of the *State of Wisconsin v. Jackie Mason*, Case No. 12CF000228, and was responsible for the Plaintiff being unlawfully imprisoned for over ten years.

The Plaintiff asserts Carlson did not have probable cause to arrest and/or detain the Plaintiff, failed to properly investigate this matter, and acted maliciously.

The Plaintiff asserts Carlson's actions violated his rights under the 4<sup>th</sup> Amendment of the United States Constitution.

**JON CHARLES:** On January 10, 2012, arrested and/or detain the Plaintiff, Jackie Mason, in the city of Milwaukee. In support of the Plaintiff's detention Charles filed Milwaukee Police Incident # 080760177, alleging the Plaintiff committed one count of felony battery, and one count of 3<sup>rd</sup> degree sexual assault. This allegation became counts 1 and 2 of the *State of Wisconsin v. Jackie Mason*, Case No. 12CF000228, and was responsible in part for the Plaintiff being unlawfully imprisoned for over 10 years.

The Plaintiff asserts Charles did not have probable cause to arrest or detain the Plaintiff, and further, included in Report # 080760177, statements that were knowingly false.

The Plaintiff asserts Jon Charles actions in this matter violated his right under the 4<sup>th</sup> Amendment of the United States Constitution.

**PHILIP SIMMERT II:** On January 10, 2012, arrested and/or detained the Plaintiff, Jackie Mason, in the city of Milwaukee. In support of the Plaintiff's detention Simmert filed Milwaukee Police Incident Report #080760177, alleging the Plaintiff committed one count of felony battery, and one count of 3<sup>rd</sup> degree sexual assault. This allegation was the bases for count's 1 and 2 of *State of Wisconsin v. Jackie Mason*, Case No 12CF000228, and was in part responsible for the Plaintiff being unlawfully imprisoned for over 10 years.

The Plaintiff asserts Simmert did not have probable cause to arrest or detain the Plaintiff, and further included in Report #080760177, statements that were knowingly false.

The Plaintiff asserts the actions of Philip Simmert II in arresting him violated his rights under the 4<sup>th</sup> Amendment of the United States

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

The Plaintiff seeks an award of money in the amount of \$ 10,000,000.00 from Charles, \$ 10,000,000.00 from Simmert, \$ 10,000,000.00 from Carlson, \$ 10,000,000.00 from Boehlke, and \$ 10,000,000.00 from Johnson

E. JURY DEMAND

I want a jury to hear my case.

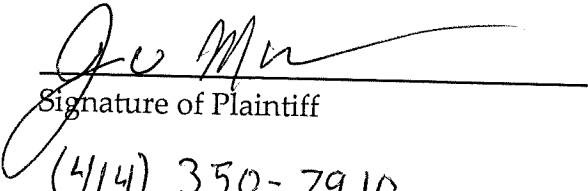
☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 7<sup>th</sup> day of January 2025.

Respectfully Submitted,

  
Signature of Plaintiff

(414) 350-7910  
Plaintiff's Telephone Number

\_\_\_\_\_  
Plaintiff's Email Address

Text (414) 350-7910 or (414) 356-  
4302 (5915 N 74<sup>th</sup> Milwaukee, WI 53218  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.